

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

BEN GARRISON,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 3:20-cv-00040-GEC
)	
ANTI-DEFAMATION LEAGUE,)	
)	
Defendant.)	
_____)	

**CONSENT MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Defendant Anti-Defamation League (“ADL”), by and through its undersigned attorneys, and pursuant to Fed. R. Civ. P. 6(b) and W.D. Va. Civ. R. 11(c)(2), hereby moves the Court to extend the deadline for the filing of its answer or other responsive pleading to and including November 30, 2020. In support of the motion, ADL declares as follows:

1. On July 10, 2020, Plaintiff Ben Garrison filed a complaint against ADL seeking damages for defamation, conversion, and trespass to chattels, as well as a permanent injunction. ECF No. 1.

2. ADL was served on October 8, 2020. Under the Federal Rules of Civil Procedure, ADL’s deadline to answer or otherwise respond to the Complaint is October 29, 2020. ADL retained undersigned counsel on October 20, 2020.

3. ADL requires additional time to review and analyze the basis for Plaintiff’s allegations of defamation, conversion, and trespass to chattels, and Plaintiff’s request for a permanent injunction, and to prepare their answer or other response to the Complaint.

4. ADL therefore seeks an extension of time to answer or otherwise respond to the Complaint from October 29, 2020 to and including November 30, 2020. ADL has shown good cause justifying the relief requested and the extension will not cause undue delay. W.D. Va. Civ. R. 11(c)(2).

5. Counsel for ADL conferred with counsel for Plaintiff, and counsel for Plaintiff has consented to the relief requested in this motion.

6. As the Motion is unopposed, and pursuant to W.D. Va. Civ. R. 11(b), the parties waive oral argument, and respectfully request that the Court decide the Motion without a hearing.

WHEREFORE, ADL respectfully requests that the Court enter an Order extending the time for ADL to answer or otherwise respond to the Complaint from October 29, 2020 to and including November 30, 2020, without waiver of any defenses including but not limited to defenses or arguments addressing the Court's jurisdiction.

Dated: October 26, 2020

Respectfully submitted,

/s/ Patrick John Curran Jr.

Patrick John Curran Jr. (VA Bar No. 86144)

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Consent Motion for an Extension of Time was served upon all counsel of record on the 26th day of October, 2020 via use of the Court's ECF system and email.

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/s/ Patrick John Curran Jr.

Patrick John Curran Jr.